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16 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
17

18 UNITED STATES OF AMERICA, *ex rel.*,  
19 GARY BRUNSON, DONNA BUSCHE-  
GIESA, AND WALTER TAMOSAITIS,  
20 PH.D.,

Plaintiff,

21 vs.

22 BECHTEL NATIONAL INC., BECHTEL  
CORPORATION, URS CORPORATION,  
23 AND URS ENERGY & CONSTRUCTION,  
INC.,  
24

25 Defendants.

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

NOV 23 2016

SEAN E. McAVOY, CLERK  
DEPUTY  
SPOKANE, WASHINGTON

NO. CV-13-5013-EFS

UNITED STATES' NOTICE OF  
SETTLEMENT

**FILED UNDER SEAL**

1 The United States submits this Notice of Settlement to advise the Court of the  
2 status of the final settlement agreement between the United States, the Relators, and  
3 the Defendants ("the Parties"), resolving all allegations set forth in the Relators'  
4 Amended Complaint.

5 The Parties have now executed a final settlement agreement. Accordingly,  
6 the United States requests that the Court unseal Relators' Amended Complaint, the  
7 United States' Notice of Election to Intervene in Part, and this Notice of Settlement.  
8 The executed final settlement agreement requires payment in full within 45 days.  
9 Upon receipt of payment in full, the United States anticipates filing a stipulated  
10 dismissal and proposed order requesting that this Court retain jurisdiction over the  
11 matter in order to, *inter alia*, enforce the final settlement agreement and decide the  
12 Relators' share under 31 U.S.C. § 3730(d) if it cannot be resolved without the  
13 Court's assistance.

14 Respectfully submitted this 23<sup>rd</sup> day of November, 2016.

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20 /s/ Don Williamson

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